

# EXHIBIT D

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RUBY FREEMAN and WANDREA' MOSS

**No. 24-cv-6563(LJL)**

Plaintiffs,

-against-

Defendants' response to Plaintiffs'  
First Set of Interrogatories

RUDOLPH W. GIULIANI

Defendant.

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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33.3 of the Southern District of New York, Defendant Rudolph W. Giuliani submit the responses to Plaintiffs' First Set of Interrogatories.

**RESPONSES TO INTERROGATORIES**

LOCAL CIVIL RULE 33.3(c) INTERROGATORY NO. 1: Identify the date on which You contend You established the Palm Beach Condo as Your homestead within the meaning of article X, section 4 of the Florida Constitution.

**RESPONSE:** January 1, 2024.

Dated: December 1, 2024  
Staten Island, New York

*Joseph M. Cammarata, Esq.*

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SOUTHERN DISTRICT OF NEW YORK

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RUBY FREEMAN and WANDREA' MOSS

**No. 24-cv-6563(LJL)**

Plaintiffs,

-against-

RUDOLPH W. GIULIANI

Defendants' verification of  
Defendant's response to Plaintiffs'  
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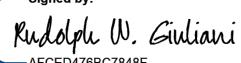
Defendant.

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## Verification

Rudolph W. Giuliani hereby declares under penalties of perjury that the facts stated in the foregoing Defendant's Responses to Plaintiffs' First Set of Interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: December 1, 2024

Signed by:  
  
AFCED476BC7848E

Rudolph W. Giuliani

NITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1: Identify all witnesses with whom You have discussed Your intentions to establish a permanent residence at the Palm Beach Condo.

RESPONSE: Dr. Maria Ryan, and Theodore Goodman.

Defendant reserves the right to supplement this response up to the time of trial in the event that the Defendant recollects any additional persons with whom he had such discussions with.

INTERROGATORY NO. 2: Identify all witnesses with knowledge of Your travel and lodging arrangements, whether personal or business-related, for the period of July 1, 2023, through the present.

RESPONSE: Dr. Maria Ryan and Theodore Goodman, Michael Ragusa, and Ryan Medrano.

**INTERROGATORY NO. 3:** Identify all Documents You intend to rely on to support your claim that You established a homestead at the Palm Beach Condo within the meaning of article X, section 4 of the Florida Constitution.

**RESPONSE:** Defendant intends to rely on documents including but not limited to the following to support Defendant's claim that Defendant established a homestead at the Palm Beach Condo within the meaning of article X, section 4 of the Florida Constitution: (a) Florida driver's license of Rudolph W. Giuliani dated February 22, 2024; (b) Deed dated January 14, 2020 in the name of Rudolph W. Giuliani for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida, (c) Vehicle tag for 1980 Mercedes which bore Florida tag JA3414; (d) Voter registration in the State of Florida – voter registration number 132378699 dated May 17, 2024; (e) Utility bills for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida; (f) Declaration of Domicile filed in the Office of the Palm Beach County Clerk on July 15, 2024; (g) calendar noting Defendants' presence inside and outside the State of Florida in 2024; (h) documents to show that defendant actually occupied the Palm Beach Condo in accordance with the Florida Constitution, (i) records of Records of the Palm Beach County Property Appraiser and/or Plam Beach County Clerk and (j) other documents which Defendant reserves the right to submit and use as evidence in this action.

**INTERROGATORY NO. 4:** Identify any financial, medical, or legal professional or firm whom you have consulted during the period of January 1, 2020, through the present.

**RESPONSE:** Defendant objects to this interrogatory to the extent that it seeks information and/or a response that is protected from disclosure by any privilege, including, but not limited to the attorney-client privilege and/or work product doctrine and doctor patient privilege.

INTERROGATORY NO. 5: Identify all individuals with whom You consulted or communicated and all witnesses or Documents you relied on or referenced in order to prepare and serve responses to Plaintiffs' Requests for Admissions, Interrogatories, or Requests for Production, or to prepare and file Your Declaration, Rule 56.1 Statement, and/or Declaration of Domicile, and any document filed in this case.

**RESPONSE:** Kenneth Caruso, Esq., and David Labkowski for all above and Gary Rosen, Esq., for Declaration of Domicile.

INTERROGATORY NO. 6: Identify all witnesses with knowledge of and all Documents reflecting Your efforts to preserve materials relevant to the above captioned case.

**RESPONSE:** Dr. Maria Ryan, Theodore Goodman, and Corporate Transfer.

INTERROGATORY NO. 7: Identify all electronic devices that You have used or on which You have stored any Documents or made any Communications during the period January 1, 2023, through the present.

**RESPONSE:** Cell phone and Ipad.

INTERROGATORY NO. 8: Identify all email accounts, messaging accounts, and phone numbers that You have used during the period January 1, 2023, through the present.

**RESPONSE:** Defendant objects to this interrogatory as it poses a safety and security concern to his wellbeing, as there were previous threats received by Defendant.

INTERROGATORY NO. 9: Identify in detail the efforts you undertook to preserve relevant evidence and to collect and produce responsive materials in response to Plaintiffs' Requests for Production.

**RESPONSE:** I did not throw out any documents and I maintained whatever documents that I had regarding responsive materials in response to Plaintiffs' Requests for Production.

Dated: December 1, 2024  
Staten Island, New York

*Joseph M. Cammarata, Esq.*

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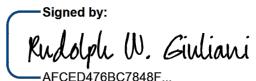
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Rudolph W. Giuliani